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Attorneys for Defendant  
United States Department of Homeland Security

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION**

GONZALES & GONZALES BONDS  
AND INSURANCE AGENCY, INC.,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

Defendant.

Case No. C 11-02267 DMR

Honorable Donna M. Ryu

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING THE DEADLINE  
FOR PLAINTIFF TO FILE MOTION FOR  
ATTORNEY'S FEES AND BILL OF  
COSTS**

1 Plaintiff Gonzales & Gonzales Bonds and Insurance Agency, Inc. (“G&G” or  
2 “Plaintiff”) and Defendant United States Department of Homeland Security (“DHS”), by and  
3 through their respective counsel, make the following representations and stipulate and agree as  
4 follows:

5 G&G and DHS are continuing to engage in meaningful meet and confer discussions  
6 regarding G&G’s motion for attorney’s fees and bill of costs based on the Court’s Order of  
7 December 21, 2012, which ruled upon the parties’ motions for summary judgment in this  
8 Freedom of Information Act case. The most recent discussion occurred on May 2, 2013, and  
9 the parties expect to continue discussions over the next couple months. The parties’ mutual  
10 goal is to resolve the fee and cost issue without the need for motion work and a hearing on the  
11 matter.

12 The current filing deadline for the motion and bill of costs is May 15, 2013. Based on  
13 their most recent meet and confer, the parties agree that an extension to July 17, 2013 would  
14 allow for further meaningful discussion. The parties therefore respectfully request that the  
15 Court approve this requested extension.

16 This is the sixth requested extension of the original January 4, 2013 deadline.

17 DHS’ deadline for filing opposition to G&G’s motion for attorney’s fees and bill of  
18 costs would continue to be 30 days from the filing of G&G’s motion and bill of costs.

19 The requested extension would not affect the schedule for the case.

20 Nothing herein shall constitute a waiver of DHS’ right to oppose or object to G&G’s  
21 motion for attorney’s fees and bill of costs.

Respectfully submitted,

Dated: May 6, 2013

ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP

/s/ David R. Ginsburg

Gary A. Nye

David R. Ginsburg

Attorneys for Plaintiff

Gonzales & Gonzales Bonds and Insurance  
Agency, Inc.

Respectfully submitted,

Dated: May 6, 2013

MELINDA HAAG

United States Attorney

/s/ Ann Marie Reding

ANN MARIE REDING

Assistant United States Attorney

Attorneys for Defendant

Department of Homeland Security

1 **~~PROPOSED~~ ORDER**

2 Pursuant to the stipulation by the parties, the Court extends from May 15, 2013 to  
3 July 17, 2013, the deadline for G&G to file its motion for attorney's fees and its bill of costs.  
4 DHS' deadline to file opposition to G&G's motion for attorney's fees and bill of costs will  
5 remain 30 days from the filing of G&G's motion and bill of costs.

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8 IT IS SO ORDERED.

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11 Dated: May 7, 2013



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13 THE HONORABLE DONNA M. RYU  
14 UNITED STATES MAGISTRATE JUDGE  
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